

Environmental Protection Agency Docket Number OPP-2003-0010

Dear Environmental Protection Agency Docket Number OPP-2003-0010,

I am writing in reference to the proposed rulemaking regarding pesticide registrations. After 30 years, the Endangered Species Act (ESA) remains our most important vehicle for saving the nation's irreplaceable and imperiled wildlife. Unfortunately, the potential rulemaking threatens to weaken this historic law, by undermining the ability of the U.S. Fish and Wildlife Service (USFWS) and the National Marine Fisheries Service (NMFS) to protect and recover threatened and endangered species.

The proposed rule would exempt the Environmental Protection Agency (EPA) from consulting the USFWS and the NMFS regarding effects of pesticides on endangered species, whenever the EPA unilaterally concludes that use of the pesticides is "not likely to adversely affect" a listed species. Currently, under ESA regulations, all "not likely to adversely affect" determinations require concurrence by FWS or NMFS experts. As a result of this proposal, the EPA would be free to make decisions affecting imperiled species without significant input from the agencies with the most complete information about the needs of those species. This proposal constitutes a clear attack on the ESA, and, if passed, would set a dangerous precedent for other federal agencies.

Over 1 billion pounds of pesticides are used each year on farms, ranches, lawns and golf courses across the United States. The adverse affect of these pesticides on wildlife is well documented. Four decades ago, the federal government allowed DDT to be used without taking impacts to wildlife into consideration. As a result of this neglect, the bald eagle, our national symbol, plummeted toward extinction. The administration should learn from history and refrain from taking any steps that would allow the government to again ignore the impacts of pesticides on wildlife.

I strongly believe the EPA should follow the established consultation process whenever registering pesticides and reject the administration's proposal, which essentially calls for the USFWS and NMFS to relinquish much of their watchdog role over actions harmful to threatened and endangered species .

Thank you for your consideration.

Sincerely,

Jennifer Stanhope  
7879 Sunset Drive  
Hayes, Virginia 23072

cc:

Senator John Warner

Senator George Allen

Representative Jo Ann Davis